

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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*This document relates to:*  
All Actions

**FIRST DECLARATION OF STEVEN R. POUNIAN IN SUPPORT OF  
THE ASHTON PLAINTIFFS' MOTION TO COMPEL SAUDI ARABIA  
TO PRODUCE DOCUMENTS CONCERNING THREE KINGDOM OFFICIALS,  
AND TO REVISE THIS COURT'S MARCH 2018 ORDER TO CONFORM  
WITH RECENT SECOND CIRCUIT AIDING-ABETTING TERROR CASES**

I, Steven R. Pounian, declare as follows:

1. I am an attorney duly admitted before this Court, am Of Counsel to the firm of Kreindler & Kreindler LLP, attorneys for Plaintiffs, and am familiar with this litigation and the prior proceedings relevant to the subject motion.
2. I respectfully submit this Declaration on behalf of the *Ashton* plaintiffs to submit to the Court the following documents in support of the *Ashton* Plaintiffs' Motion to Compel Saudi Arabia to Produce Documents Concerning Three Kingdom Officials, and to Revise this Court's March 2018 Order to Conform with Recent Second Circuit Aiding-Abetting Terror Cases.
3. Attached as Exhibit 1 is a true and correct copy of various documents publicly released by the Federal Bureau of Investigation (FBI) on its website on November 2, 2021 as a result of President Biden's September 3, 2021 Executive Order 14040.
4. Attached as Exhibit 2 is a true and correct copy of the August 24, 2021 letter from Clinton Seagroves, U.S. Department of State, to Megan Bennett of Kreindler & Kreindler

confirming official records of the State Department showing, *inter alia*, that Adel al Sadhan and Mutaeb al Sudairy were listed by Saudi Arabia as staff members of the Saudi Embassy in Washington in 1999-2001.

5. Attached as Exhibit 3 is a true and correct copy of a page from the 9/11 Timeline Report publically released by the FBI from its 9/11 investigation.

6. Attached as Exhibit 4 is a true and correct copy of the public version of the FBI's Operation Encore April 4, 2016 Report released on September 11, 2021 as a result of President Biden's September 3, 2021 Executive Order 14040.

7. Attached as Exhibit 5 is a true and correct copy of a "Summary of Saudi Arabian checks received by Omar A. Mohamed" filed as Exhibit 29 at the trial in *United States v. Mohamed*, 03CR3433-JAH (S.D. Ca.) and marked as Deposition Exhibit 418 in this litigation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 17, 2021

/s/ Steven R. Pounian  
Steven R. Pounian